

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 09-50 (02) MJD/FLN

UNITED STATES OF AMERICA,)
)
Plaintiff,) MOTION FOR MODIFICATION
) OF CONDITIONAL RELEASE
v.)
)
SALAH OSMAN AHMED,)
)
Defendant.)

Comes now Defendant Salah Osman Ahmed, through undersigned counsel, respectfully requesting a modification of his conditional release to permit his travel between the Minneapolis, Minnesota area and the Seattle, Washington, area, subject on every occasion to prior approval and terms of supervision to be established by United States Probation. The current Order for Conditional Release restricts Mr. Ahmed to the District of Minnesota and requires the Court itself to consider every request Mr. Ahmed has for travel outside of Minnesota. The request for modification is limited to Mr. Ahmed's travel to and from Seattle, Washington, and does not seek unsupervised travel privileges. The Court has once previously granted special permission for Mr. Ahmed's travel to Seattle, and that trip was completed in full compliance with the special terms of that travel order.

Mr. Ahmed desires to travel between Minneapolis and Seattle on two or more occasions over the next few months for family purposes which have been more fully explained by undersigned counsel to Assistant United States Attorney Charles Kovats and United States Probation Officer Penny Wickenheiser.

Mr. Kovats has authorized undersigned counsel to represent to the Court that he

has no objections on behalf of the United States to such a limited modification. Ms. Wickenheiser, too, has authorized the representation that United States Probation would not object to this change in the Order for Conditional Release. Ms. Wickenheiser has informed undersigned counsel that Mr. Ahmed appears to be in full compliance with his terms of release and doing well.

The purpose of the modification is to eliminate the need for making separate motions to the Court prior to each request for travel between Minnesota and Seattle, and is justified by Mr. Ahmed's good conduct during his lengthy history on pretrial release.

For the foregoing reasons, Mr. Ahmed respectfully requests this Court's Order modifying his conditional release pending sentencing as follows:

Amending Paragraph 8(i) of the Order for Conditional Release, filed March 15, 2010 [Doc. No. 74], to read, "Travel shall be restricted to Minnesota, except that defendant may travel between Minnesota and the Seattle, Washington, area with prior approval of United States Probation and subject to terms and conditions established by United States Probation for its supervision of such travel on each occasion."

This motion is based on all the files and records herein.

Date: February 21, 2012

/s/ **James E. Ostgard**

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